

**Entertainment Unlimited, Inc.  
733 Marsh Street  
Suite B  
San Luis Obispo, California 93401**

**Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554**

**Re: WT Docket No. 01-309  
HAC Digital Wireless Telephones**

**Fourth Semi-Annual Report**

Dear Ms. Dortch:

The Filer, Entertainment Unlimited, Inc., is the licensee of Broadband Personal Communications Service ("PCS") Stations KNLF915 (Channel Block D, Salinas – Monterey, California BTA), KNLG742 (Channel Block D, San Luis Obispo, California BTA), KNLG743 (Channel Block F, San Luis Obispo, California BTA), KNLG744 (Channel Block D, Santa Barbara – Santa Maria, California BTA), WPOK945 (Channel Block C, Bakersville, California BTA) and WPOK946 (Channel Block C, Visalia – Porterville – Hanford, California). This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission's Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 ("R&O").

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission's E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer provides Broadband PCS service in the Salinas – Monterey, California, San Luis Obispo, California, Santa Barbara – Santa Maria, California, Bakersfield, California and Visalia – Porterville – Hanford, California BTAs. The digital portion of the Filer's wireless system employs the Time Division Multiple Access ("TDMA") air interface. The Filer currently markets the following TDMA digital wireless telephones: A) Ericsson Model T61D; B) Nokia Models 1260, 2260, 3360, 3560, 5165, 6360, 6560 and 8265-B; and C) Motorola Models V601 and C353-T. All are tri-mode telephones (*i.e.*, analog cellular, TDMA cellular and TDMA Broadband PCS). Upon information and belief, none of these units meets a U3 (or M3) or U3T (or M3T) rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility ("HAC") requirements of the R&O, the Filer is literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution decisions of wireless handset manufacturers; and, accordingly, must rely on the

manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

**Item 1 -- Digital Wireless Phones Tested:** The Filer has not tested any digital wireless telephones for HAC compliance. All testing will be performed by the handset manufacturers.

**Item 2 -- Laboratory Used:** None. See Response to Item 1.

**Item 3 -- Test Results For Each Phone Tested:** Not applicable. See Response to Item 1.

**Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19:** Upon information and belief, none of the handsets marketed by the Filer meets a U3 (or M3) or U3T (or MT3) rating under ANSI Standard C63.19.

**Item 5 -- Report On The Status Of Product Labeling:** None. It is anticipated that product labeling will be handled by the handset manufacturers.

**Item 6 -- Report On Outreach Efforts:** The Filer is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.

**Item 7 -- Information Related To Retail Availability of Compliant Phones:** Upon information and belief, there are currently no TDMA handsets commercially available that meet a U3 (or M3) or U3T (or M3T) rating under ANSI Standard C63.19.

**Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones:** The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

**Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order:** None.

**Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report:** Upon information and belief, there are currently no TDMA handsets commercially available that meet a U3 (or M3) or U3T (or M3T) rating under ANSI Standard C63.19. The TDMA digital wireless phone models marketed by the Filer are as set forth in the second paragraph of this report; and, upon information and belief, none of these models meet a U3 (or M3) or U3T (or M3T) rating under ANSI Standard C63.19.

**Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices:** Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

**Entertainment Unlimited, Inc.**

Dated: 11/17/05

By: 

Robert M. Jackson  
Its Attorney

**In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:**

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